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Attorney for Defendant
BRYAN PAUL TAMBLYN

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

| | | |
|---------------------------|---|--|
| UNITED STATES OF AMERICA, |) | Case No. 2:20-cr-00014-KJM |
| |) | |
| Plaintiff, |) | STIPULATION FOR TEMPORARY |
| |) | MODIFICATION OF CONDITIONS OF PRETRIAL |
| vs. |) | RELEASE; PROPOSED ORDER |
| |) | |
| BRYAN PAUL TAMBLYN, |) | Hon. Jeremy D. Peterson |
| |) | |
| Defendant. |) | |
| |) | |

The defendant, BRYAN PAUL TAMBLYN, by and through his attorney of record, Assistant Federal Defender Megan T. Hopkins, and the UNITED STATES, by and through its attorney of record, Christina McCall, hereby stipulate to and request an order from this Court temporarily modifying the conditions of Mr. Tamblyn's pretrial release to permit him to attend a family gathering at his mother's home in Sacramento, CA, to celebrate Memorial Day. The parties have conferred with Mr. Tamblyn's assigned pretrial services officer, who approves of this stipulated modification.

Mr. Tamblyn has been on pretrial release in this district since February 2020, on a \$50,000 unsecured appearance bond as well as an appearance bond secured by deeds of trust and co-signed by his uncle, Jerome Espinosa and grandfather, Richard Espinosa. *See* Dkt. 26 (unsecured appearance bond) and Dkt. 29 (appearance bond secured by deeds of trust). Additionally, Mr. Tamblyn has three (3) appointed third party custodians: Richard Espinosa, Sr., Jerome Espinosa, and Sheri Placencia.

1 Mr. Tamblyn is in compliance with all of his conditions of release. One of those
2 conditions of release is location monitoring. Mr. Tamblyn is subject to home detention, and
3 therefore must remain inside his residence at all times except for employment; education;
4 religious services; medical, substance abuse, or mental health treatment; attorney visits; court
5 appearances; court ordered obligations; or other activities pre-approved by the pretrial services
6 officer¹.

7 Mr. Tamblyn requests, and the parties agree and so stipulate, that his Conditions of
8 Release be temporarily amended to specifically permit him to attend a family gathering at his
9 mother's home in Sacramento, CA. Mr. Tamblyn's mother is hosting a gathering of family
10 members to celebrate Memorial Day from 3:00 p.m. to 9:00 p.m. on Monday, May 31, 2021. The
11 guests will include Mr. Tamblyn's parents, siblings, aunts and uncles, nieces and nephews. Any
12 minors in attendance will be accompanied by their parents, whose names and contact information
13 have been provided to the pretrial services officer.

14 Mr. Tamblyn's mother's home is (approximately) a 35-minute drive from Mr. Tamblyn's
15 residence in Elk Grove, CA. Allowing some additional time for traffic and the time set aside for
16 the day's festivities, the parties request a temporary modification of pretrial conditions to permit
17 Mr. Tamblyn's release from the monitor between 2:30 p.m. and 9:30 p.m. on Monday, May 31,
18 2021. Mr. Tamblyn will be in the company of at least two third party custodians and multiple
19 sureties at his mother's home. Mr. Tamblyn will drive directly to his mother's home from his
20 residence and will immediately return to his residence at the conclusion of the gathering.

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27 ¹ Pretrial services interprets this condition to only permit their approval of other activities which are deemed
28 essential, with all other activities requiring the approval of the Court. The pretrial services officer who supervises
Mr. Tamblyn advised defense counsel that this specific request should be submitted to the Court for approval, in the
form of a stipulation by the parties.

1 The proposed temporarily amended condition is attached to this request. The parties do not
2 request a hearing in this matter in light of this stipulation.

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4 Respectfully submitted,

5 DATED: May 27, 2021

HEATHER E. WILLIAMS

6 Federal Defender

7 /s/ Megan T. Hopkins

8 MEGAN T. HOPKINS

Assistant Federal Defender

9 Attorney for BRYAN PAUL TAMBLYN

10
11 DATED: May 27, 2021

PHILLIP A. TALBERT

12 Acting United States Attorney

13 /s/ Christina McCall

14 CHRISTINA MCCALL

Assistant United States Attorney

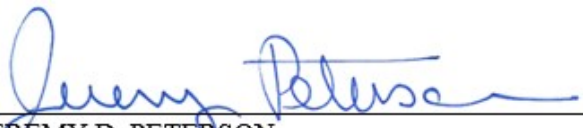
15 Attorney for the United States

1 **~~PROPOSED~~ ORDER**

2 GOOD CAUSE HAVING BEEN SHOWN, IT IS HEREBY ORDERED THAT the
3 Special Conditions of Release for defendant, Bryan Paul Tamblyn, be Temporarily Amended
4 such that the he is permitted to attend a family gathering in celebration of Memorial Day at his
5 mother's home in Sacramento, CA between the hours of 2:30 p.m. and 9:30 p.m. on Monday,
6 May 31, 2021. Mr. Tamblyn shall travel directly to and from the event and shall be in the
7 presence of a third party custodian for the entire time he is at the gathering. Mr. Tamblyn shall
8 not be in the presence of any juveniles or minors unless that juvenile or minor's parent or
9 guardian is also present. All other conditions of pretrial release shall remain in force.

10 The Temporary Amended Special Condition of Release is hereby adopted.

11 DATED: May 28, 2021

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13 JEREMY D. PETERSON
14 UNITED STATES MAGISTRATE JUDGE
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